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8 *Counsel for Defendant, JP Morgan Chase Bank, N.A.*

9
10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 MA OLIVIA ABAD,

13 Plaintiff,

14 v.

15 **EQUIFAX INFORMATION SERVICES LLC;**
16 EXPERIAN INFORMATION SOLUTIONS,
17 INC.; JPMORGAN CHASE BANK, N.A.;
18 CITIBANK, N.A.; SYNCHRONY FINANCIAL;
19 CAPITAL ONE BAN, NATIONAL
ASSOCIATION; BANK OF AMERICA
CORPORATION; AMERICAN EXPRESS,
INC.; and DISCOVER BANK,

20 Defendants.

CASE NO. 2:25-cv-00090-CDS-DJA
JOINT MOTION
~~**STIPULATION AND PROPOSED**~~
ORDER TO EXTEND TIME TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)

21
 22 Plaintiff, Ma Olivia Abad and Defendant, JP Morgan Chase Bank, N.A. (“Chase”), by and
 23 through their respective counsel, stipulate and agree to an extension of time for Chase to respond
 24 to the Complaint. The parties continue to discuss a potential resolution to this case but require
 25 additional time to pursue those discussions. Accordingly, pursuant to LR IA 6-2, it is hereby
 26 stipulated and agreed to by counsel that Chase’s time to respond to the Complaint is extended from
 27 . . .
 28 . . .

1 February 12, 2025, to **March 14, 2025**. This stipulation is filed in good faith and not intended to
 2 cause delay.

3 **IT IS SO STIPULATED.**

4 DATED this 11th day of February 2025

5 **FREEDOM LAW FIRM, LLC**

6 */s/ Gerardo Avalos*

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10 *Attorneys for Plaintiff Ma Olivia Abad*

DATED this 11th day of February 2025

GREENBERG TRAURIG, LLP

/s/ Alix R. Goldstein

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Counsel for Defendant, JP Morgan Chase Bank, N.A.

14
 15 **ORDER**

16 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their
 17 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing
 as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court
 18 GRANTS the joint motion (ECF No. 15).

19 DATED: 2/12/2025

20

 21 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **February 11, 2025**, I caused the foregoing **STIPULATION AND ORDER** to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ *Evelyn Escobar-Gaddi*

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